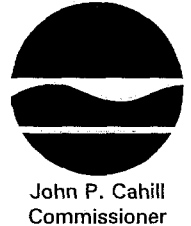


New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Radiation & Hazardous Site Management
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MAR 10 1999

Mr. Raymond L. Pilon
U. S. Army Engineering District, Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199

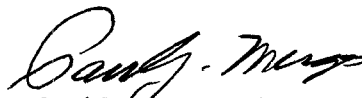
Dear Mr. Pilon:

Re: Draft Scope of Work - Remedial Investigation/Feasibility Study/Proposed Plan for the
Niagara Falls Storage Site, Lewiston, New York

This letter provides additional New York State Department of Environmental Conservation comments on the Draft Scope of Work - Remedial Investigation/ Feasibility Study/Proposed Plan for the Niagara Falls Storage Site, Lewiston, New York.

Thank you for the opportunity to comment on this document. If you have any questions or need further information, please contact me at the above telephone number.

Sincerely,



Paul J. Merges, Ph.D.

Director

Bureau of Radiation & Hazardous Site Management

cc: Lieutenant Colonial M. Feierstein, USACE
P Giardina, USEPA
R. Aldrich, NYSDOL
K. Rimawi, NYSDOH

New York State Department of Environmental Conservation's
Additional Comments on the
Draft Scope of Work - Remedial Investigation/Feasibility Study/Proposed Plan
for the Niagara Falls Storage Site, Lewiston, New York (December 1998)

1: Page 7, Section 2.1:

The strategy for this site should be the remediation of all contaminants, not just the radiological contaminants.

Although the FUSRAP and FUDS programs are separate and have different funding sources, efforts should be made to have investigations of this site by each program complement each other and avoid duplication of efforts.

2: Page 8, Section 2.3:

If the objective of this RI/FS is to develop a record of decision (ROD) for the residues and wastes which have accumulated at the site as part of the former Lake Ontario Storage Site (in other words, all radiological contamination at the site and vicinity properties), then the scope needs to be expanded.

3: Page 10, Section 3.5:

Depending on the concentration of materials left at the site, groundwater fate and transport determinations may still be required.

4: Page 12, Section 3.7:

The plan states that - "twenty percent of the borings and wells will be analyzed for full TCL/TAL parameters.". What will the other 80% of the borings and wells be analyzed for?

5: Page 13, Section 3.9:

The presence of asbestos and lead base paint needs to be considered when addressing the demolition of Building 401.

6: Page 14, Section 7.0:

A Fish and Wildlife Impact Analysis will be required in addition to the Human health risk assessment.

7: Page 16, Section 10.3:

It would be helpful if the electronic deliverables are compatible with the ones being developed for the Lake Ontario Ordnance Works RI/FS.

8: Appendix 1, Fate and Transport modeling:

Page 22 : Is 30 years a sufficient time frame for radionuclide concerns?

Page 24 : There should be a "time gap" between identifying additional data needs and the running of the model in order to collect the data.